

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JAMES HAYES, <i>et al.</i>,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 3:14-cv-258-JAG
)	
DELBERT SERVICES CORPORATION, <i>et al.</i>,)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF AN AGREED ORDER

For the reasons stated herein and in the accompanying Memorandum, Plaintiffs, through their attorneys of record, respectfully request that the Court enter the accompanying Proposed Order (attached as Exhibit 1), to allow the third parties and the Defendants to comply with the Order entered on June 29, 2016 (Dkt. No. 102), without further prejudice to Plaintiffs. Specifically, they are asking the Court to enlarge the time for Plaintiffs to take the depositions currently already schedule before the July 12, 2016 discovery response and production date and as necessary to complete additional written discovery and notice depositions based upon new information obtained in the July 12, 2016 production.

The enlargement would also best accommodate a mid-July decision as to consolidation of this case with the *White, et al. v. Cashcall, Inc.* matter.

Defendants do not agree to the full relief sought herein, and would agree only to move the currently noticed depositions until July 30, 2016 without the contemplation of any other derivative discovery.

Dated: _____, 2016

Respectfully submitted,

JAMES HAYES, *et al.*

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July 2016 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to all counsel of record.

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